

ETHYLENEAMINES PRODUCT STEWARDSHIP DISCUSSION GROUP
AEEA TESTING CONSORTIUM

Contains No CBI

November 9, 2007

Via Certified Mail
Return Receipt Number
7006 2150 0000 7432 2191



Contains NO CBI

NOV 16 10:29 AM '07

TSCA Confidential Business Information Center (7407M)
EPA East -- Room 6428
Attn: Section 8(e)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Re: Toxic Substances Control Act -- Section 8(e)



Dear TSCA Section 8(e) Coordinator:

The Ethyleneamines Product Stewardship Discussion Group (EPSDG) Aminoethylethanolamine (AEEA) Testing Consortium (Consortium), c/o Mr. Timothy J. Cawley, c/o Bergeson & Campbell, P.C., 1203 Nineteenth Street, N.W., Suite 300, Washington, D.C. 20036-2401, submits to the U.S. Environmental Protection Agency (EPA), pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA), information it has obtained regarding the detection of AEEA on a site owned by Omya, Inc. in Proctor, Vermont. The EPSDG AEEA Testing Consortium is comprised of the following companies: Akzo Nobel Functional Chemicals, LLC, BASF Corporation, The Dow Chemical Company, and Huntsman Corporation.

Specifically, the Consortium was informed by representatives of Omya that there were two detections of AEEA in the parts per billion range in an on-site groundwater sample and an on-site surface water sample as part of a risk assessment being conducted on Omya's site pursuant to a law passed by the State of Vermont. Information regarding the risk assessment being conducted can be found on the Internet at <http://www.omyainvermont.net/index.htm>. The Consortium understands that specific information regarding the detections of AEEA will be reported to the Vermont Department of Environmental Conservation.

Although the Consortium has not made a determination that reporting is required under TSCA Section 8(e), the Consortium nevertheless wishes to provide this information to EPA. If EPA requires any additional information, the Consortium suggests it speak with Omya or the Vermont Department of Environmental Conservation. If you have any questions that the

{0237.006 / 7 / 00022070.DOC 5}

The Dow Chemical Company • Timothy J. Cawley • 39 Old Ridgebury Road, K4-473 • Danbury, CT 06817
Huntsman Corporation • Eric D. Ewen • 10003 Woodloch Forest Drive • The Woodlands, Texas 78380 •
Akzo Nobel Functional Chemicals LLC • Mark R. Schroeder • 5 Livingstone Ave • Dobbs Ferry, NY 10522 •
BASF Corporation • 100 Campus Drive • Florham Park, NJ 07932 • BASF Aktiengesellschaft • Matthias
Andreae • Carl-Bosch-Strasse 38 • Ludwigshafen. Rheinland-Pfalz, D-67056, Germany

308067

ETHYLENEAMINES PRODUCT STEWARDSHIP DISCUSSION GROUP
AEEA TESTING CONSORTIUM

TSCA Confidential Business Information Center (7407M)

November 9, 2007

Page 2

Consortium may be able to answer, please contact Lynn L. Bergeson at (202) 557-3801 or lbergeson@lawbc.com.

Sincerely,

Timothy J. Cawley

Timothy J. Cawley, Chair
EPSDG AEEA Testing Consortium

cc: EPSDG AEEA Testing Consortium (via e-mail)